

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ASSOCIATION OF THEATRICAL PRESS
AGENTS AND MANAGERS, UNION NO.
18032, I.A.T.S.E., AFL-CIO, CLC, by GORDON
FORBES, as SECRETARY-TREASURER,

Plaintiff,

-against-

ASTOR SHOW PRODUCTIONS, INC. d/b/a
BLUE MAN GROUP "TUBES," MARIA DIDIA,
and MANUEL IGREJAS,

Defendants.

Case No. 08-CV-4395 (SAS)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the annexed Affidavit of Kenneth L. Shaitelman, the accompanying Memorandum of Law In Support of Defendants' Motion to Dismiss the Complaint, and upon all other pleadings and proceedings had in this matter, Defendants Astor Show Productions, Inc. d/b/a Blue Man Group, Maria Di Dia, and Manuel Igrejas (collectively "Defendants"), by and through their undersigned counsel, will move this Court before the Honorable Shira A. Scheindlin, United States District Judge, 500 Pearl Street, New York, New York, at such date and time as the Court shall determine, for an Order granting Defendants' Motion to Dismiss the Complaint, and any further relief that the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Section III.B of the "Individual Rules and Practices of Judge Shira A. Scheindlin," pre-motion letters were exchanged by the parties in this case.

Dated: New York, New York
June 10, 2008

Respectfully submitted,

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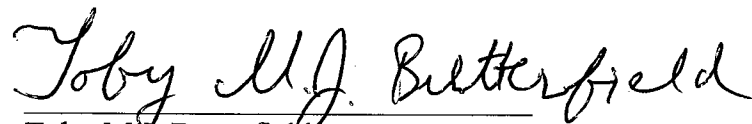
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Attorneys for Defendant Manuel Igrejas

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June 2008, I caused a true and correct copy of the foregoing Notice of Motion to be served by UPS Overnight Delivery on Plaintiff's attorneys at the following address:

Jane Lauer Barker
Michael D'Angelo
PITTA & DREIER LLP
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New York, New York 10022


Kenneth L. Shaitelman